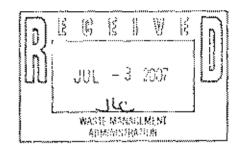
Honeywell

101 Columbia Road Morristown, NJ 07962-1139 Tel: 973-455-4682

Fax: 973-455-3082

Horacio Tablada Director, Waste Management Administration Maryland Department of the Environment 1800 Washington Boulevard Baltimore, MD 21230



July 2, 2007

Dear Mr. Tablada:

Honeywell has been diligently preparing to remediate the properties along West McComas Street since receiving your June 11th letter addressed to Chris French.

We met with all but one of the property owners and occupants along West McComas Street (Honeywell's attempts to contact the last owner were unsuccessful), sought and obtained permits from Baltimore City for the work, prepared the attached work plan and distributed simple access agreements (copies attached). (The Health & Safety Plan referenced in the work plan as Appendix B will be provided under separate cover.)

Honeywell is prepared, on a voluntary basis, to immediately commence work to remove at least three inches of soil from the back yards, vacuum loose dust and replace it with clean soil or concrete, and restore the properties, including the planting of grass and other landscaping. We will pay for all costs. Because of engineering constraints (the need for an adequate base for the concrete for example) the removal will typically involve more than three inches of soil.

We were prepared to start work this Monday (July 2nd) if we received signed rights of access to the properties. Unfortunately, we have been informed by the legal representatives of the residents that they are not, at this time, granting us access to do the work. Signed grants of access that we have previously received have, in fact, been withdrawn.

Honeywell will begin the remediation and restoration of the properties as soon as access is provided.

Sincerely.

Dave Wickersham

Director, Remediation and Evaluation Services

Enclosures: Work Plan, Access Agreement

David & Weekenham

CONSENT FOR ACCESS TO PROPERTY FOR RESPONSE ACTION

Name:	
	Evening Telephone Number:
Property Address:	
Owner	
Tenant []	
Honeywell International, Inc. ("MDE") entering and having of taking a response action in and/or existing concrete patio with clean soil and/or backfil any grass or other vegetation	imployees, contractors, and authorized representatives of and the Maryland Department of the Environment gracess to my property identified above for the purpose cluding: (1) preparing for and excavating/removing soil of from my property; (2) backfilling the excavated area(s) and/or pouring a new concrete patio; and (3) restoring or structures to their pre-excavation state. Response properties that MDE determines require cleanup.
right to refuse and without the Honeywell or MDE or author me in advance before the reminvolved in the excavation and MDE will take to restore my damage to structures such as Honeywell or MDE or author	reats or promises of any kind. I understand that rized representatives of Honeywell or MDE will contact toval of soil or concrete begins to discuss the steps of removal program and all measures Honeywell or yard and patio. I also understand that if there is any sidewalks that is caused by the work conducted by rized representatives of Honeywell or MDE, then rized representatives of Honeywell or MDE shall repair
Date	
Signature	
Print Name	

Residential Remedial Action Work Plan

For Residential Properties Located at the McComas Street Site Baltimore Maryland

Prepared for

Honeywell International Inc.

June 2007



99 Cherry Hill Road Suite 200 Parsippany, New Jersey 07054



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Introduction

This work plan, prepared for Honeywell, presents the scope and proposed approach to conduct remedial activities at residential properties located at 201, 203, 205, 207, 209, 211, and 213 McComas Street in Baltimore, Maryland.

This work plan provides a description of the tasks that will be performed to complete the residential remedial actions. The following site-specific documents provide further detail for portions of this work plan and are provided as Appendices:

- Pre-and Post-Construction Survey Property Checklists (Appendix A)
- Health and Safety Plan (HSP) (Appendix B)

Site Background

1.1.1 Site Description

The residential remedial action area consists of individual properties located at McComas Street in Baltimore, Maryland.

The Site is situated in a multi-use area that includes residential, industrial and recreational properties.

1.1.2 2007 Residential Soil Sampling

Residential soil sampling was conducted in May 2007 by the Maryland Department of the Environment (MDE) to evaluate potential soil issues in residential backyards on West McComas Street. Three of the seven homes were sampled by the MDE and those results indicated that elevated levels of certain constituents were discovered. In a letter dated June 11, 2007 MDE presented the results of the soil sampling to the homeowners as well as the expected steps to address the soil. In a letter to Honeywell dated June 11, 2007, MDE stated that it has determined that arsenic levels were sufficiently high that a remedial action must be performed.

1.2 Objectives of the Residential Remedial Action Work Plan

The primary objectives of the Residential Remedial Action Work Plan are to identify the procedures that will be used to:

- Remove arsenic impacted soil from residential properties to a minimum depth of 3 inches,
- Restore those portions of the residential properties impacted during the remedial action to a condition similar to the condition immediately prior to the commencement of the remedial action, and
- Prepare a Residential Remedial Action Completion Report to document the remedial activities.

Scope of Work

2.1 Property Selection

MDE has requested the removal of a minimum of 3 inches of soils containing arsenic from the backyards of residences at 201, 207 and 209 McComas Street. Remedial activities will also be conducted at 203, 205, 211, and 213 McComas Street. Individual property activities will include the backyard of each residence only.

2.2 Community Involvement Approach

Pre-construction survey meetings will be conducted with each of the individual property owners and representatives from Honeywell and/or its contractors. The meetings will be conducted at the individual properties to discuss schedule, access, the remedial action process, property-specific restoration, safety, security, and communication. As part of the meeting, Pre-Construction Property Checklist Survey will be completed (Appendix A).

A residential pre-construction meeting will be conducted with each of the individual property owners and representatives from Honeywell and/or its contractors several days prior to the start of remedial action at the individual property. At this meeting, a copy of the edited Pre-Construction Checklist Survey from the previous meeting, along with a description of the work that will be conducted will be provided to each property owner to document the work to be conducted. The meeting will also be used to discuss and confirm the actual schedule, access, restoration, and security issues and to document pre-construction property conditions.

Appropriate health and safety measures will be taken to protect the community and the workers throughout the remedial process. Residential excavations will be secured with orange plastic construction barrier fencing, a minimum of 36-inches high around the perimeter of the excavation areas using steel 'T" posts spaced at 6-foot intervals to separate pedestrian traffic from the work. All storage, staging, and lay down areas will be located at the Race Street site within the fenced and locked area. Barricades and lighting will be provided as necessary to prevent unauthorized entry to construction areas and to ensure public safety.

Work zones shall be clearly defined by orange construction fencing during remedial action activities – site residents will be requested not to enter work zones during remedial action activities. If a resident inadvertently enters the exclusion zone or encounters contaminated materials, decontamination materials will be available for residential use. Additional information regarding resident and worker protection is located in the Health and Safety Plan (Appendix B).

2.3 Pre-Construction Activities

A site-specific Health and Safety Plan (HSP) has been developed for the residential remedial actions (Appendix B). Specifically, the HSP outlines the requirements for a daily health and safety meeting, required personal protective equipment, site-specific hazards, air and dust monitoring specifications, and decontamination procedures. These procedures are to be

followed to ensure the work is completed safely and with no adverse health effects to workers or the community. In addition, air and dust monitoring will be conducted as described in Section 2.3.1 with further details contained in the HSP.

2.3.1 Air and Dust Monitoring

Real time air sampling for total particulate (dust) will be performed during the remedial action implementation activities.

Additional information regarding the site-specific action levels and permissible exposure limits (PELs) for dust is included in the site specific Health and Safety Plan (Appendix B).

2.3.2 Pre-Construction Property Surveys

During the pre-construction survey, a "Pre-Construction Property Survey Checklist" will be completed to document the existing conditions at each individual residence. A copy of a Pre-Construction Checklist Survey template is provided in Appendix A. During the subsequent pre-construction meeting, digital photographs or a video recording of the property may be used to document the physical condition of vegetation, structures, sidewalks, and pavements within the individual property work area.

A copy of the Pre-construction Agreement, created from the Pre-Construction Checklist Survey, along with a copy of the construction drawing will be provided to each property owner prior to the start of the property remedial action. A sample Pre-construction Agreement template is provided in Appendix A.

In addition to the Pre-Construction Checklist Survey CH2M HILL will utilize a licensed surveyor to document the existing conditions at the site with a detailed survey. The survey will provide definite locations of common fence lines as well as the property boundaries for each home. The data collected by the survey will be critical during the initial remedial action to ensure that we do not encroach on residences were we have no access agreements. In addition, during reconstruction the survey date that was originally collected will be utilized to pinpoint the exact original location for the newly constructed features so property line disputes are eliminated.

2.3.3 Mobilization

Construction equipment and materials, and temporary storage (as needed) of property owner and resident belongings will be stored at nearby secured staging, storage, and lay down areas located at Race Street. The staging area will include temporary parking, portable sanitary facilities, staging of an aboveground storage tank (AST) to store fuel for equipment, and lay down of equipment and materials.

2.3.4 Site Preparation

The pre-construction survey checklist and meeting, that will be completed and agreed upon prior to mobilization to each property, will determine and document the extent of site preparation required.

Site preparation may include, as necessary, the removal or protection of trees, shrubs, vegetation, fencing, and encumbrances to soil excavation. The common fence lines between

each property will establish the excavation area. Orange safety cones, caution tape, and orange plastic construction barrier fencing will be placed around the excavation at the end of each working day.

Private property items such as patio furniture and planters will be moved from the site, as necessary and will be labeled, securely stored, and returned to the property upon completion of restoration. Private property that will not be moved during site preparation will be protected from soil with a plastic covering or similar means. Necessary measures (described further below) will be implemented to protect existing buildings and utilities from construction activities.

Storm water run-on/runoff controls will be installed to prevent migration of storm water into the work area of from the work area to storm sewers, street gutters, streets, sidewalks, and driveways.

2.3.5 Utility Locate

Utility clearance will be requested from the local one-call system (MISS UTILITIES) prior to mobilization. Utilities will be verified as marked prior to excavation on each property and protected from damage during construction. Hand digging will be utilized to locate a utility line when located by MISS UTILITIES within 2 feet outside of the excavation.

2.4 Remedial Action Implementation

It is estimated that remedial action implementation at an individual property will require 5 days. This process will involve site preparation (discussed in Section 2.3.3 above), excavation, backfilling/compaction, and property restoration as described in the following subsections.

2.4.1 Excavation

MDE has requested that a minimum of 3 inches of soil containing arsenic be removed. In order to prepare adequate sub bases for patio replacement, additional soils may be excavated. It is currently estimated that 8 to 12 inches of soil may be removed to facilitate patio installation.

The access to soil excavation areas will be determined on a property-specific basis. Width of access may be limited in some locations and may not allow for the use of conventional equipment. The scope includes the use of mechanical equipment and/or manual equipment, depending on the width of access to the property. For mechanical excavation, a mini-excavator will be utilized. Manual excavation will be completed using traditional hand tools such as picks and shovels.

Soil excavation will be performed to include the following limits:

.....

- Soil excavation will include the use of mechanical and/or manual means and methods
 depending on access restrictions. Loose dust will be vacuumed and removed prior to and
 during excavation activities using equipment equipped with a HEPA particulate filter.
- Standard practices will be employed to protect existing conditions and the health and safety
 of both employees involved in the remedial action and the community.
- Excavation is limited to soil beneath the concrete slabs as well as the exposed soil areas.

- Excavation parallel or adjacent to structures will maintain a nominal 45-degree (1:1) slope from grade to specified depth of excavation.
- Excavated material will not be placed next to an excavation or stockpiled overnight on driveways, streets, sidewalks, or any concrete or asphalt surfaces.
- Water or other suppression means will be used to control dust and airborne dirt.
- Any refuse, rubbish, and/or other discarded material including loose or broken concrete
 that is discovered during excavation will be removed with the soil and disposed of
 accordingly. In general, buried concrete structures would remain in place. However,
 decisions will be made on a site-specific basis.

2.4.2 Transportation and Disposal

Excavated material will be staged for disposal at the Race Street site in dedicated roll-off boxes. Non-soil features that may require removal and disposal will be segregated from soil for management off-site as construction debris or yard waste as applicable. Excavated soil will be removed from the residences for disposal via roll-off boxes. A transporter licensed for commercial transportation will complete transportation of the excavated material following waste characterization, and each truckload will be covered with a fully functioning tarp system. Provisions for removal of soil from equipment and daily street/alley cleaning will be developed to minimize soil tracking and maintain a clean work area.

Waste characterization sampling will be performed for the generated soil and concrete debris to support establishment of waste profiles with an approved offsite non-hazardous disposal facility. Non-soil features that qualify as construction debris or yard waste will be managed separately.

2.4.3 Backfilling/Compaction

Imported structural fill material will be delivered and used to provide a stable sub base for the installation of concrete patios. Structural fill material will be placed at various depths, where applicable, up to the depth of the proposed bottom of the concrete patio. Structural fill will be compacted with a walk behind plate compactor in no greater than 6-inch lifts. The backfilled areas will be compacted in a manner that prevents differential settlement, sinkholes, subsidence, etc.

2.4.4 Restoration

Those portions of individual residential properties impacted by the remedial action will be restored to a condition similar to that existing immediately prior to the remedial action. This will include the installation of concrete patios that will be finished in an architectural finish suitable to the owner. Restoration activities at each property will be site-specific and dependent on pre-existing conditions documented by the pre-construction survey checklist, and/or the pre-construction video and photographs.

2.5 Post-Construction Review

A post-construction meeting will be held with each property owner following the completion of the restoration. During this meeting, the completed work will be reviewed and a punch list of action items will be developed as necessary. During the meeting, a copy of the edited survey notes and construction drawings will be reviewed to confirm the information gathered during the pre-construction survey meeting has been satisfied. Photographs and video of the restored work will be obtained during the meeting. A post-construction checklist will be developed prior to remedial action implementation.

An additional post-construction meeting will be held if necessary following the completetion of any punch list items that were identified during the initial post-construction meeting. After this step, project closeout will be initiated as described in the following section.

Project Completion

3.1 Demobilization

After the completion of all remedial activities and all punch list items, all field equipment, temporary facilities, and all other items brought on-site during remedial action implementation will be removed. All wastes and general construction debris generated by the remedial action activities will be properly managed of off-site. Street, sidewalks and common areas utilized during the work will be cleaned/restored.

3.2 Property-Specific Documentation

Once the work has been completed, Honeywell will attempt to obtain signatures of property owners as documentation that the work has been completed. Property owners will receive a copy of the signed document.

Residential Remedial Action Completion Report

Following remedial action completion, a Residential Remedial Action Completion Report will be prepared and submitted to Honeywell. A proposed outline of the Residential Remedial Action Completion Report is presented below.

Residential Remedial Action Completion Report Outline

Executive Summary

- 1. Introduction
 - 1.1 Purpose of Report
 - 1.2 Site Background
 - 1.2.1 Site Description
 - 1.2.2 Previous Investigations
 - 1.3 Report Organization
- 2. Summary of Residential Remedial Action
 - 2.1 Excavation
 - 2.2 Backfill and Restoration
- Residential Remedial Action Documentation
 - 3.1 Certification of Clean Backfill Material
 - 3.2 Pre and Post Construction Survey Documentation
 - 3.3 Waste Disposal Documentation
- Conclusions and Recommendations
- References

Project Assumptions

Assumptions that are critical to implement the work in an effective manner are listed below.

- Access agreements in place with owners
- Right of way in place to access back yard
- City of Baltimore construction permit secured
- Utilities are cleared and verified by MISS Utilities
- Staging Area for Roll off boxes determined
- Staging of owners' personnel property agreed to
- Work plan and HASP prepared, reviewed and signed.
- Limited access or logistical restrictions arise while working within the residential area in a sequential fashion.
- No significant weather delays occur within the critical implementation phases.
- Unexpected conditions are not encountered.
- Additional properties can be incorporated into the schedule in an efficient fashion as needed.

Pre-Construction Property Survey Checklist Template and Meeting Summary

V XIGNEADIX V

Add	ressProperty Owner Present				
	2M Hill RepresentativeContractor Representative				
Da	e of Meeting Time of Meeting				
1.	Type Of Property Residential Vacant Lot Vacant Lot with Structures				
2.	Vacant Lot Structure Type				
3.	is the property safe to enter?				
Sa	ety Concerns:				
4.	Occupied Tyes Tho				
	Front Yard				
5,	Any front access obstructions? []Yes []No []Gates []Fence - Removable? (Y/N):				
	Stairs (number)UpDown[_] Entrance StaircaseRaised PlantersLandscaping				
	Sidewalk Center Gate WidthHeightInches Sidewalk Side Gate WidthHeightInches				
	Front Passage Gate Width HeightInches (measure at narrowest/lowest point)				
	Front Passage between structures to backyard Widthheightinches				
	Other/ Comments				
6.	Front Passage Obstructions				
	☐Hose reel ☐Stairs (number) ☐Up ☐Down ☐Utility Meters ☐Building Entrance				
	Other/Comments:				
7,	Sidewalk Fence Type Wrought iron Chain Link Metal Wood				
	☐Brick/Block				
Ott	er & Combinations/Comments:				
8.	# Sidewalk Fence Posts Including Corners: # Side Fence Posts:				
9.	North Front Yard Fence Type Wrought iron Chain Link Metal Wood				
	Brick/Block				
٥t١	er & Combinations/Comments:				
10.	South Front Yard Fence Type Wrought iron Chain Link Metal Wood				
	Brick/Block				
Oti	er & Combinations/Comments:				
12	Fence Anchored to Property Building Tyes No				
	Fence Anchored to Adjacent Building Tyes No				

13 Visible Front Yard Utilities	? ☐Yes ☐No	Gas Water Electrical Other
14 Property boundary market	rs observed	
[]Fence	Structure	Survey marker Landscaping
Ground covers	Pavement [☐Owner's knowledge
Other/Comments		· · · · · · · · · · · · · · · · · · ·
15 Front Yard Paved areas Brick/concrete pavers		☐Sidewalks ☐Concrete Stabs ☐
16. Front Yard Soil Area Dime	nsions (feet) and	shape
Area 1 Width	L.ength	Location
Shape	Ground	d Cover:
Area 2 Width	Length	Location
Shape	Ground	d Cover:
Area 3 Width	Length	Location
Shape	Ground	d Cover:
		ats

	Back	and Side Yard
18. Back and Side Yard Paved		reway
Brick/concrete pavers	Yarc	d level Vehicle Parking Area
Raised Vehicle Parking		· ·
Other Comments		
		ugh Garage Only Double Garage Door Opens Alley to
20. ∏Backyard Passage to A point)	lley Gate Width	HeightInches (measure at narrowest/lowest
21. 🗌 Aliey Gate #1 Width	Height	_Inches 🗌 Vehicle Gate 🔲 Person Gate 🗍 Not present
22. Alley Gate #2 Width	Height	_inches ☐ Vehicle Gate ☐ Person Gate ☐Not present
		_inches 🗍 Vehicle Gate 🔲 Person Gate 🗍 Not present
		· · · · · · · · · · · · · · · · · · ·
24. Any Backyard Obstruction	s Present?	
	irs(number)	□Fence □Planters
☐Raised Parking Area		-
First terrore t essay in the en	The second second	to an income to the second to

	Other/Comments
25.	Number Of Structures Present On Property ☐1 ☐2 ☐3 ☐4 ☐5
26.	Structure Types
	Constructed storage shed Storage Building
	Other (describe)
27.	Alley Obstructions:
28.	Back Yard North Fence Type Wrought iron Chain Link Metal Wood
	☐ Brick/Block
Oth	er/Combinations/Comments:
29.	Back Yard South Fence Type Wrought iron Chain Link Metal Wood
	Brick/Block
Oth	er/Combinations/Comments:
30.	Back Yard Alley Fence Type☐ Wrought iron ☐Chain Link ☐Metal ☐Wood
	☐Brick/Block
Oth	er/Combinations/Comments:
31.	Back Yard Additional Fence Type Wrought from Chain Link Metal Wood
	Brick/Block
32.	Other/Combinations/Comments:
33.	Additional Fence Location and Description
34.	# Alley Fence Posts Including Corners # North Side Fence Posts # South Side Fence Posts
35.	Fence Anchored to Property Building ☐Yes ☐No
	Fence Anchored to Adjacent Building Tyes TNo
36.	Visible (overhead) or marked utilities?
	☐Yes (Note locations of utilities on site sketch) ☐No
37.	Evidence of Underground or Marked Underground utilities (No overhead lines to electrified garage, visible conduit to underground lines)?
	☐Yes (Note locations of utilities on site sketch) ☐No ☐ Backyard Utilities
	Located During Residential Sampling? Location
38.	Back Yard Soil Area Dimensions (feet) and shape

Area 1 Width	Length	Location
		ef :
		Location
		r:
		Location
		r:
39. Does the Resident		ainage problems on the property (i.e. ponding water
Location	Description	
	t have any knowledge of any bu deceased pets, electric lines) or	ried items (i.e. USTs, sprinkler systems, storm in the property?
Location	Description	
Location	Description	<u></u>
Location	Description	
Location	Description	
41. List of Trees/Plant Construction	s Resident Does Not Want Rem	oved from Yards and Protected During
Location	Description	
Location		······································
Location	Description	
Location		
Location		
Location	Description	
Location	Description	
Location		
Location	Description	
Location		·
Location		

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Location	_Description
	_Description
	_Description
	s Removed from Yards and Disposed
Location	Description
	Description
Location	Description
43. List of Items in Yard That M	ust Be Moved Prior to Construction
Location	
Item Will Be Moved By ☐Resid	ent Contractor
Location	Description
Item Will Be Moved By ☐Resid	ent Contractor
Location	Description
Item Will Be Moved By Resid	ent Contractor
Location	Description
ltem Will Be Moved By ⊡Resid	ent Contractor
Location	Description
Itom Will Be Moved By □Resid	ent Contractor
Location	Description
ltem Will Be Moved By ∏Resid	ent Contractor
Location	Description
Item Will Be Moved By Resid	ent Contractor

LocationDe	scription
Item Will Be Moved ByResident	
LocationDes	scription
Item Will Be Moved By TResident	
LocationDes	scription
Item Will Be Moved By □Resident	
LocationDes	scription
Item Will Be Moved By ☐Resident	☐Contractor
LocationDet	scription
Item Will Be Moved By ☐Resident	☐Centractor
LocationOes	cription
ltem Will Be Moved By ☐Resident	☐Contractor
44. Previous Site Drawing back and	Side Yard Comments
	atures, mulch, pavers, boarders, or other:
46. Description of pools, gazebos, sl	heds, flag poles or other:
47. Property Owner/Tenant Special	
Digital Photographs taken: Referen	

Digital Video Record Taken: Reference number & file path/name:

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эдшпи hadmuM noiteaiG Description Stames? of ord Picture "esaappA

Address

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Attach Property Sketches Here

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Health and Safety Plan

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